



# Oregon

Dr. John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

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December 20, 2011

also sent via e-mail

Mr. Ted McCall  
McCall Oil and Chemical Corporation  
5480 NW Front Avenue  
Portland, OR 97210

RE: DEQ comments for the McCall Oil and Chemical Corporation *Updated Source Control Evaluation Report, May 2011*  
ECSI #134

Dear Mr. McCall:

DEQ has completed the review of the *Updated Source Control Evaluation Report (Report)* for the McCall Oil and Chemical Corporation Site in Portland, Oregon. DEQ has provided the following comments.

## General Comments

The letter provides DEQ comments and a request for additional information to support a source control decision (SCD). DEQ will review the request modifications and prepare a SCD for the site. The following section provides specific comments.

## Specific Comments

1. Pages 2 and 3, Sections 1.1.3 1.1.2, and 1.1.5

The comparison of chemical concentrations with those of comparable site is a line of evidence but may only indicate that all sites are contaminated. Although a line of evidence, the NPDES data evaluation does not monitor for a complete list of Portland Harbor constituents and the limits are not typically protective of all receptors.

2. Page 28, Section 6.2

Chironomous tentans is now named Chironomous dilutes

3. Page 33, Section 7.1

The cited DEQ guidance does not suggest using a comparison to Willamette River Background levels as the initial screening step.

4. Page 40, Section 7.3.2

Carbon disulfide concentrations are greater than the SLV and it is not appropriate to drop this chemical. Vinyl chloride concentrations exceed PRGs and is it is not appropriate to drop this chemical.

USEPA SF



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5. Page 46, Section 7.7.2

Total Suspended Solid (TSS) was evaluated from NPDES data for Stations S-1 and S-3 but no TSS data was provided for NPDES sampling of Drainage Area 1. This information should be submitted to support the Report.

6. Table 3

The reference for Table 3 is incorrect for lack of impacts and the table only addresses arsenic.

7. Table 3B

The appropriate fish consumption rate for Portland Harbor Sites is 175 g/day to protect subsistence and tribal fishers. The source of the background concentrations is not provided.

8. Table 4A

The SQS/CLS values from Washington State (Avocet 2010) do not have regulatory standing in Oregon and are not accepted screening values by DEQ toxicologists.

9. Section 7.2, Tables 6 and 7

See comments #4. DEQ does not screen based on a site-wide mean. The arsenic in drinking water screening level is 0.045 ppb.

10. Table 8

The reference for Table 8 is incorrect for the effectiveness of source control measures.

11. Table 9

The DEQ sediment bioaccumulation screening values used are based on the general fish consumption rate of 17.5 g/day. The table should use a fish consumption rate of 142 g/day for subsistence and tribal consumption. The yellow highlighting appears to indicate human health levels are exceeded and not ecological screening levels, as stated in the table.

12. Table 11

No reference is provided for typical industrial stormwater.

13. Table 12

No reference is provided for typical industrial stormwater.

14. Table 13

See comment #4.

15. DEQ had requested a discussion of current/historical operations of each drainage area and an evaluation if sampling locations are sufficient for the SCE. This discussion should also provide stormwater data, as detailed in DEQ guidance, to document sampling conditions. This may be represented by a stormwater sampling event hydrograph with the sampling event identified for all stormwater samples.

16. Figure 3

Drainage Area 3 has three catch basins that do not have discharge connections. The evaluation of the nature of these catch basins is required.

17. High Flow bypass Outfall to River

Please describe the operation of the High Flow Bypass Outfall to river. What is the typical discharge frequency and duration during a typical water year?

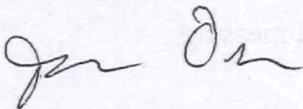
18. Site Cleanout Data

Records of the dates of implementation of site source control measures and volume of site cleanout materials would be useful in evaluation of effectiveness of controls. Please provide a discussion of these issues.

DEQ requests an addendum to your report with the modifications of the tables, a discussion of requested information, and submittal of data to respond to our comments. No response is requested for other specific comments #1 through #4. DEQ will review the addendum and prepare a SCD for the site, if supported by the submittal.

Please call (503) 229-5039, if you have questions.

Sincerely,



Jim Orr, R.G.  
Project Manager  
NW Region Cleanup Section

cc: Tom Gainer, DEQ NWR  
Ken Thiessen, DEQ NWR  
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Tim Dean, Portland BES  
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